

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING, LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Objection Deadline:

April 4, 2024, at 4:00 p.m. (ET)

Hearing Date:

June 13, 2024, at 1:00 p.m. (ET)

**NOTICE OF COMBINED SECOND MONTHLY AND SECOND INTERIM FEE
APPLICATION OF MORRIS, NICHOLS, ARSHT & TUNNELL LLP,
AS CO-COUNSEL TO THE AD HOC COMMITTEE OF NON-US
CUSTOMERS OF FTX.COM, FOR ALLOWANCE OF MONTHLY
COMPENSATION AND FOR REIMBURSEMENT OF ALL ACTUAL
AND NECESSARY EXPENSES INCURRED FOR THE PERIOD
NOVEMBER 1, 2023, THROUGH AND INCLUDING JANUARY 31, 2024**

PLEASE TAKE NOTICE that on the date hereof, Morris, Nichols, Arsht & Tunnell LLP (“Morris Nichols”) filed its *Combined Second Monthly and Second Interim Fee Application of Morris, Nichols, Arsht & Tunnell LLP, as Co-Counsel to the Ad Hoc Committee of Non-US Customers of FTX.com, for Allowance of Monthly Compensation and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period of November 1, 2023, through and including January 31, 2024* (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the Application must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435] entered by the Court (the “Interim Compensation Order”), and are required to be filed on or before **April 4, 2024 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the Clerk of the Court, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801, and must be served on the following parties so as to be received by such parties on or before the Objection Deadline:

- i. Co-counsel to the Ad Hoc Committee of Non-US Customers of FTX.com, (a) Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market St., 16th Floor, Wilmington, Delaware
Attn: Matthew B. Harvey (mharvey@morrisnichols.com) and Jonathan M. Weyand

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. A complete list of the debtors and the last four digits of their federal tax identification numbers may be obtained at <https://cases.ra.kroll.com/FTX>.

(jweyand@morrishnichols.com); and (b) Eversheds Sutherland (US) LLP, The Grace Building, 40th Floor, 1114 Avenue of the Americas, New York, New York 10036, Attn: Sarah Paul (SarahPaul@eversheds-sutherland.us) and Erin Broderick (erinbroderick@eversheds-sutherland.com);

- ii. counsel to the above-captioned debtors and debtors in possession, (a) Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Alexa J. Kranzley (kranzleya@sullcrom.com) and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Adam G. Landis (landis@lrclaw.com) and Kimberly A. Brown (brown@lrclaw.com);
- iii. counsel to the Official Committee of Unsecured Creditors, (a) Paul Hastings LLP, 200 Park Avenue, New York, New York 10166, Attn: Kris Hansen (krishansen@paulhastings.com), Erez Gilad (erezgilad@paulhastings.com) and Gabriel Sasson (gabesasson@paulhastings.com) and (b) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Attn: Matthew B. Lunn (mlunn@ycst.com) and Robert F. Poppiti, Jr. (rpoppiti@ycst.com);
- iv. the U.S. Trustee, 844 King Street, Suite 2207, Wilmington, Delaware 19801, Attn: Benjamin A. Hackman (benjamin.a.hackman@usdoj.gov), Linda Richenderfer (linda.richenderfer@usdoj.gov) and Jonathan Lipshie (jon.lipshie@usdoj.gov); and
- v. counsel to Katherine Stadler, the fee examiner appointed in the Debtors' chapter 11 cases, Godfrey & Kahn, S.C., One East Main Street, Suite 500, Madison, Wisconsin 53703 Attn: Mark Hancock (mhancock@gklaw.com).

PLEASE TAKE FURTHER NOTICE THAT IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER, IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER AND THE ABOVE PROCEDURES, THE DEBTORS WILL BE AUTHORIZED TO PAY MORRIS NICHOLS 80% OF THE FEES AND 100% OF THE EXPENSES REQUESTED IN THE MONTHLY FEE STATEMENTS THAT ARE NOT DISPUTED WITHOUT FURTHER ORDER OF THE COURT.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE APPLICATION WILL BE HELD ON JUNE 13, 2024, AT 1:00 P.M. (ET) BEFORE THE HONORABLE JOHN T. DORSEY, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 15, 2024
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jonathan M. Weyand

Eric D. Schwartz (No. 3134)

Matthew B. Harvey (No. 5186)

Jonathan M. Weyand (No. 6959)

1201 North Market Street, 16th Floor

Wilmington, Delaware 19801

Telephone: (302) 658-9200

Facsimile: (302) 658-3989

E-mail: eschwartz@morrisnichols.com

mharvey@morrisnichols.com

jweyand@morrisnichols.com

*Co-Counsel to the Ad-Hoc Committee of Non-US
Customers of FTX.com*